

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

CORNELIUS DOLLY,	)	
	)	
<i>PLAINTIFF,</i>	)	
	)	
v.	)	
	)	
CB SQUARED SERVICES, INC., D/B/A	)	CIVIL ACTION No. 3:14CV00543MHL
JIFFY LUBE.	)	
	)	
<i>DEFENDANT.</i>	)	

**STIPULATION OF DISMISSAL WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for Plaintiff Cornelius Dolly and Defendant CB Squared Services, Inc. d/b/a Jiffy Lube that the above-entitled action be dismissed in its entirety with prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), without attorneys' fees or costs to any party, and waiving all rights of appeal.

The Court retains jurisdiction to enforce the terms of the Memorandum of Understanding Regarding Settlement Agreement entered into by the parties on November 14, 2014, and to issue an arbitration award resulting from any breach of the terms of said Memorandum of Understanding Regarding Settlement Agreement.

Respectfully submitted,

CORNELIUS DOLLY

CB SQUARED SERVICES, INC D/B/A JIFFY  
LUBE

By: /s/ Lauren E. Fisher

By: /s/ K. Barrett Luxhoj

Lauren E. Fisher (VSB #80360)  
Tim Schulte (VSB # 41881)  
Blackwell N. Shelley, Jr. (VSB #28142)  
Shelley Cupp Schulte, P.C.  
2020 Monument Avenue

K. Barrett Luxhoj (VSB 86302)  
Paul L. Warren (VSB 27454)  
Jared Arthur Clay (VSB 83755)  
John H. Coston IV (VSB 83774)  
WARREN & ASSOCIATES PLC

Richmond, VA 23220  
(804) 644-9700  
(804) 278-9634 (fax)  
shelley@scs-work.com  
schulte@scs-work.com  
[fisher@scs-work.com](mailto:fisher@scs-work.com)

*Counsel for Plaintiff*

Dated: November 24, 2014

409 Duke Street  
Norfolk, Virginia 23510  
Tel: 757.274.0047  
Fax: 757.274.0055  
[jwarren@warrenplc.com](mailto:jwarren@warrenplc.com)  
[kbluxhoj@warrenplc.com](mailto:kbluxhoj@warrenplc.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2014, I will electronically file the foregoing document with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

Paul L. Warren (VSB 27454)  
Jared Arthur Clay (VSB 83755)  
John H. Coston IV (VSB 83774)  
K. Barrett Luxhoj (VSB 86302)  
WARREN & ASSOCIATES PLC  
409 Duke Street, Suite 100  
Norfolk, Virginia 23510  
Tel: 757.274.0047  
Fax: 757.274.0055  
[jwarren@warrenplc.com](mailto:jwarren@warrenplc.com)  
[kbluxhoj@warrenplc.com](mailto:kbluxhoj@warrenplc.com)

*Counsel for Defendant*

By: /s/ Lauren E. Fisher

Lauren E. Fisher